

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

STAG WILLIAMSPORT, LLC,	X	
	:	
	:	
Plaintiff,	:	Case No. 1:21-cv-11958-NMG
v.	:	
	:	
	:	
BHN ASSOCIATES, LLC, et al.,	:	
	:	
Defendants.	:	
	:	
	X	

**MOTION FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD FOR
DEFENDANT BHN ASSOCIATES, LLC, AND FOR AN ORDER STAYING
PROCEEDINGS FOR 30 DAYS FOR DEFENDANT BHN ASSOCIATES, LLC TO FIND
SUCCESSOR COUNSEL**

Now comes Defendant BHN Associates, LLC’s (“BHN”) counsel, William C. Nystrom and Patrick L. Marinaro of Nystrom Beckman & Paris LLP and Joshua M. Herman and Avery S. Mehlman of Herrick, Feinstein LLP (collectively, “BHN’s Counsel”), and files this motion pursuant to Local Rule 83.5.2(c)(2) for leave to withdraw as counsel of record for BHN (the “Motion”).

As grounds for this Motion, counsel refers the Court to the accompanying Memorandum of Law and Affidavit of Joshua M. Herman.

Dated: June 27, 2023
New York, New York

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By: /s/ Joshua M. Herman
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Attorneys for BHN ASSOCIATES, INC.

L.R. 7.1(A)(2) CERTIFICATION

I hereby certify that counsel for BHN Associates, LLC has conferred with counsel for STAG Williamsport, LLC regarding this motion. Plaintiff STAG Williamsport, LLC has not indicated whether Plaintiff opposes BHN's Counsel's withdrawal, but has indicated that it opposes a stay of proceedings.

/s/ Joshua M. Herman
Joshua M. Herman

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2023, a true and correct copy of the above document was electronically filed with the Clerk of the United States District Court for the District of Massachusetts by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that services will be accomplished by the CM/ECF system. I further certify that a copy of the above document was served via email and Federal Express on an authorized representative of Defendant BHN Associates, LLC.

/s/ Joshua M. Herman
Joshua M. Herman